PART 70 OPERATING PERMIT

OFFICE OF AIR MANAGEMENT and the Evansville Environmental Protection Agency

Hahn Equipment Company 1625 N. Garvin Street Evansville, IN 47711

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T163-7624-00007	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the Evansville Environmental Protection Agency,. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates stationary source for the surface coating, assembly, and shipment of multi-purpose golf course grounds-keeping equipment and consumer products.

Responsible Official: Mr. Jon Grimmer

Source Address: 1625 N. Garvin St., Evansville, Indiana 47711 Mailing Address: 1625 N. Garvin St., Evansville, Indiana 47711

SIC Code: 3523

County Location: Vanderburgh

County Status: Attainment for all criteria pollutants;

Source Status: Part 70 Permit Program

Minor Source, under PSD;

Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) one (1) spray paint booth, identified as SB-1, equipped with an overhead conveyor and closing doors at both ends, with a maximum capacity of coating one (1) metal frame per hour, utilizing airless electrostatic application with dry filters for particulate control, and exhausted through one (1) stack (S/V ID P-01);
- (b) one (1) spray paint booth, identified as SB-2, with a maximum capacity of applying 2.4 gallons of paint per hour, utilizing electrostatic with air assist application with dry filters for particulate control, and exhausted through one (1) stack (S/V ID P-02);
- (c) one (1) spray paint booth, identified as SB-3, with a maximum capacity of coating 10 feet per minute of products, utilizing electrostatic with air assist application with waterwash for particulate control, and exhausted through one (1) stack (S/V ID P-03):

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) one (1) natural gas fired heat cleaning oven rated at 515,000 Btu per hour, equipped with an afterburner and exhausted through one (1) stack.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (d) The following other insignificant activities with PM emissions less than five (5) pounds per hour or twenty-five (25) pounds per day:
 - (1) hand-held grinding and machining operations; and
 - (2) one (1) centerless grinding machine.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and the Evansville Environmental Protection Agency.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by the Evansville Environmental Protection Agency.

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B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)] B.7

This permit does not convey any property rights of any sort, or any exclusive privilege.

Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] B.8

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Boulevard Evansville, Indiana 47708

- The Permittee shall furnish to IDEM, OAM, and the Evansville Environmental Protection (b) Agency, within a reasonable time, any information that IDEM, OAM, and the Evansville Environmental Protection Agency, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- Upon request, the Permittee shall also furnish to IDEM, OAM, and the Evansville (c) Environmental Protection Agency, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and the Evansville Environmental Protection Agency, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or

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- (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Boulevard Evansville, Indiana 47708

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the Evansville Environmental Protection Agency, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:

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(1) The identification of each term or condition of this permit that is the basis of the certification:

- (2) The compliance status;
- (3) Whether compliance was based on continuous or intermittent data;
- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3):
- (5) Any insignificant activity that has been added without a permit revision; and
- (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, and the Evansville Environmental Protection Agency,, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

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(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, and the Evansville Environmental Protection Agency, upon request and shall be subject to review and approval by IDEM, OAM, and the Evansville Environmental Protection Agency.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, and the Evansville Environmental Protection Agency, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,

Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Telephone Number: 812-426-5597 (Evansville EPA) Facsimile Number: 812-4265651 (Evansville EPA)

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

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within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, and the Evansville Environmental Protection Agency, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, and the Evansville Environmental Protection Agency, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (q)(2)(B) of this condition.

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Permit Shield [326 IAC 2-7-15] B.14

This condition provides a permit shield as addressed in 326 IAC 2-7-15.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit: or
 - (2)The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and the Evansville Environmental Protection Agency, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information refers to information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - The liability of the Permittee for any violation of applicable requirements prior to (2) or at the time of this permit's issuance;
 - (3)The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - The ability of U.S. EPA to obtain information from the Permittee under Section (4) 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- This permit shield is not applicable to modifications eligible for group processing until (g) after IDEM, OAM, and the Evansville Environmental Protection Agency, has issued the modifications. [326 IAC 2-7-12(c)(7)]

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(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and the Evansville Environmental Protection Agency, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Boulevard Evansville, Indiana 47708

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, and the Evansville Environmental Protection Agency, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, and the Evansville Environmental Protection Agency, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, and the Evansville Environmental Protection Agency, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and the Evansville Environmental Protection Agency, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and the Evansville Environmental Protection Agency, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

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- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the Evansville Environmental Protection Agency, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM, and the Evansville Environmental Protection Agency, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

 If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, and the Evansville Environmental Protection Agency, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, and the Evansville Environmental Protection Agency, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)] If IDEM, OAM, and the Evansville Environmental Protection Agency, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

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Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]
 - (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
 - (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act:
 - (2) Any approval required by 326 IAC 2-1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

> Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Boulevard Evansville, Indiana 47708 and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, and the Evansville Environmental Protection Agency, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

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(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, and the Evansville Environmental Protection Agency, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, and the Evansville Environmental Protection Agency, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, and the Evansville Environmental Protection Agency, nor an authorized representative, may disclose the information unless and until IDEM, OAM, and the Evansville Environmental Protection Agency, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

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(2) The Permittee, and IDEM, OAM, and the Evansville Environmental Protection Agency, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, and the Evansville Environmental Protection Agency, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, and the Evansville Environmental Protection Agency, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, and the Evansville Environmental Protection Agency, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]
 - (a) The total source potential emissions of Carbon Monoxide (CO), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOC), Nitrous Oxides (NOx) and Particulate matter (PM-10) are less than 250 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
 - (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

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C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

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C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%), any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (b) (15) minutes (sixty (60) readings)-as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable. However, the city of Evansville has a local ordinance (3.30.18.214) which prevents open burning.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions), 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Notification requirements apply to each owner or operator. If the combined amount of (a) regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present. The condition stating that all demolition projects require notification is not federally enforceable.

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(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Boulevard Evansville, Indiana 47708

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
 The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4
 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are
 mandatory for any removal or disturbance of RACM greater than three (3) linear feet on
 pipes or three (3) square feet on any other facility components or a total of at least 0.75
 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
 The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator,
 prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to
 thoroughly inspect the affected portion of the facility for the presence of asbestos. The
 requirement that the inspector be accredited is federally enforceable.

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Testing Requirements [326 IAC 2-7-6(1)]

Performance Testing [326 IAC 3-6] C.9

All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

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no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- Has certified that all facilities at this source are in compliance with all applicable (a) requirements; and
- Has submitted a statement that the Permittee will continue to comply with such (b) requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

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Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

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in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, and the Evansville Environmental Protection Agency that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and the Evansville Environmental Protection Agency that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and the Evansville Environmental Protection Agency, upon request and shall be subject to review and approval by IDEM, OAM, and the Evansville Environmental Protection Agency. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or

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- (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6] [326 IAC 2-7-19 (e)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
 - (1) Indicate actual emissions of criteria pollutants from the source;
 - (2) Indicate actual emissions of other regulated pollutants from the source.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015 Hahn Equipment Company Evansville, Indiana

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and

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(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the Evansville Environmental Protection Agency on or before the date it is due.

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Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)] C.17

- With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- As an alternative to the observations, sampling, maintenance procedures, and record (b) keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- If for reasons beyond its control, the operator fails to make required observations. (d) sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and the Evansville Environmental Protection Agency, may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, and the Evansville Environmental Protection Agency representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the Evansville Environmental Protection Agency makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the Evansville Environmental Protection Agency within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C Compliance Monitoring Plan Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Hahn Equipment Company

Evansville, Indiana

OP No. T163-7624-00007

Permit Reviewer: JM/EVP

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Boulevard

Evansville, Indiana 47708

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the Evansville Environmental Protection Agency on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - The following surface coating operations

- one (1) spray paint booth, identified as SB-1, equipped with an overhead conveyor and (a) closing doors at both ends, with a maximum capacity of coating one (1) metal frame per hour, utilizing airless electrostatic application with dry filters for particulate control, and exhausted through one (1) stack (S/V ID P-01);
- (b) one (1) spray paint booth, identified as SB-2, with a maximum capacity of applying 2.4 gallons of paint per hour, utilizing electrostatic with air assist application with dry filters for particulate control, and exhausted through one (1) stack (S/V ID P-02);
- one (1) spray paint booth, identified as SB-3, with a maximum capacity of coating 10 feet (c) per minute of products, utilizing electrostatic with air assist application with waterwash for particulate control, and exhausted through one (1) stack (S/V ID P-03);

Emission Limitations and Standards [326 IAC 2-7-5(1)]

Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray paint booth identified as SB-2 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Particulate Matter (PM) [326 IAC 6-3-2(c)] D.1.2

Pursuant to 326 IAC 6-3-2 (c) the PM from the three (3) paint booths (SB-1,SB-2,SB-3) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ where E =rate of emission in pounds per hour; and P = process weight rate in tons per hour

Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan. of this permit, is required for each facility and any control devices.

Compliance Determination Requirements

Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit in D.1.1, or the PM limits in D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Hahn Equipment Company Evansville, Indiana

Permit Reviewer: JM/EVP

Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

Particulate Matter (PM)

The waterwash and dry filters for PM control shall be in operation at all times when the three (3) surface coating booths (SB-1, SB-2, and SB-3) are in operation.

D.1.7 Monitoring

- Daily inspections shall be performed to verify the placement, integrity and particle (a) loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (P-01,P-02,P-03) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan -Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

Record Keeping Requirements D.1.8

- To document compliance with Condition D.1.1, the Permittee shall maintain records in (a) accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - The amount and VOC content of each coating material and solvent used. (1) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the month(s) of use;
 - (3)The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;

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(5) The total VOC usage for each month; and

- (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6 and D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - The following insignificant activities:

(a) one (1) natural gas fired heat cleaning oven rated at 515,000 Btu per hour, equipped with an afterburner and exhausted through one (1) stack.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 4-2]

Pursuant to 326 IAC 4-2-2 (Incinerators), this natural gas fired heat cleaning oven, rated at 515,000 Btu per hour shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning wood products.
- (c) Comply with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2 (Permit Review Rules).
- (d) Be maintained properly as specified by the manufacturer and approved by IDEM.
- (e) Be operated according to the manufacturer's recommendation and only burn waste approved by the IDEM.
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.
- (g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented.
- (h) Not create a nuisance or a fire hazard.
- (i) Not emit particulate matter (PM) in excess of 0.5 pounds per 1000 pounds of dry exhaust gas corrected to 50% excess air.

The operation of this incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

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Compliance Determination Requirement

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT **COMPLIANCE DATA SECTION**

and the **EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Hahn Equipment Company

1625 North Garvin St., Evansville, Indiana 47711 Source Address:

Mailing Address: 1625 North Garvin St., Evansville, Indiana 47711 Part 70 Permit No.: T163-7624-00007					
This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.					
Please check what document is being certified:					
9 Annual Compliance Certification Letter					
9 Test Result (specify)					
9 Report (specify)					
9 Notification (specify)					
9 Other (specify)					
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.					
Signature:					
Printed Name:					
Title/Position:					
Date:					

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

and the EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY

PART 70 OPERATING PERMIT EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Hahn Equipment Company

Source Address: 1625 North Garvin St., Evansville, Indiana 47711 Mailing Address: 1625 North Garvin St., Evansville, Indiana 47711

Part 70 Permit No.: T163-7624-00007

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)

C The Permittee must notify the Office of Air Management (OAM), within four (4)
business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two (2) days
(Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

- 9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
 - C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A Date/Time Emergency/Deviation started: Date/Time Emergency/Deviation was corrected: Was the facility being properly operated at the time of the emergency/deviation? Y N Describe: Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NO_x, CO, Pb, other: Estimated amount of pollutant(s) emitted during emergency/deviation: Describe the steps taken to mitigate the problem: Describe the corrective actions/response steps taken:

If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Describe the measures taken to minimize emissions:

Form Completed by:	
Title / Position:	
Date:	
Phone:	

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION and the EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY

PART 70 OPERATING PERMIT QUARTERLY COMPLIANCE MONITORING REPORT

	QUARTERLY COMP	PLIANCE MONITORING	REPORT		
Source Name: Hahn Equipment Company Source Address: 1625 North Garvin St., Evansville, Indiana 47711 Mailing Address: 1625 North Garvin St., Evansville, Indiana 47711 Part 70 Permit No.: T163-7624-00007					
Months:	to Ye	ar:			
stated in this perm monitoring require be attached if nec	nit. This report shall be sub ements and the date(s) of ea essary. This form can be s rt. If no deviations occurred	as met all the compliance more mitted quarterly. Any deviation ach deviation must be reported upplemented by attaching the d, please specify in the box materials.	n from the compliance d. Additional pages may Emergency/Deviation		
9 NO DEVIATION	NS OCCURRED THIS REP	ORTING PERIOD			
9 THE FOLLOWI	NG DEVIATIONS OCCUR	RED THIS REPORTING PERI	OD.		
Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)		Number of Deviations	Date of each Deviation		
Titl Dat	rm Completed By: e/Position: te: one:				

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

and

Evansville Environmental Protection Agency

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Hahn Equipment Company

Source Location: 1625 N. Garvin St, Evansville, IN 47711

County: Vanderburgh

SIC Code: 3523

Operation Permit No.: T163-7624-00007

Permit Reviewer: Jeremy Magliaro / EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Hahn Equipment Company relating to the operation of their surface coating, assembly, and shipment of multi-purpose golf course grounds-keeping equipment and consumer products.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) one (1) spray paint booth, identified as SB-1, equipped with an overhead conveyor and closing doors at both ends, with a maximum capacity of coating one (1) metal frame per hour, utilizing air atomization application with dry filters for particulate control, and exhausted through one (1) stack (S/V ID P-01);
- (2) one (1) spray paint booth, identified as SB-2, with a maximum capacity of coating 2.4 gallons of paint per hour, utilizing airless electrostatic application with dry filters for particulate control, and exhausted through one (1) stack (S/V ID P-02); and
- one (1) spray paint booth, identified as SB-3, with a maximum capacity of coating 10 feet per minute of products, utilizing air atomization application with waterwash for particulate control, and exhausted through one (1) stack (S/V ID P-03).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired heaters combustion sources with heat input less than ten million (10,000,000) Btu per hour.
 - (a) one (1) natural gas-fired dry-off oven rated at 1.6 mmBtu/hr;
 - (b) one (1) natural gas-fired bake oven rated at 1.2 mmBtu/hr.
- (2) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
 - (a) one (1) tank with a capacity of 300 gallons;
- (3) The following VOC and HAP storage containers:
 - (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (4) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (5) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (6) Cleaners and solvents characterized as follows:
 - (a) having a vapor pressure equal to or less than 2kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100 F); or;
 - (b) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees Celsius (68 F); the used of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (7) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (8) Blowdown of any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (9) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (10) The following other insignificant activities with PM emissions less than five (5) pounds per hour or twenty-five (25) pounds per day:
 - (a) hand-held grinding and machining operations; and
 - (b) one (1) centerless grinding machine.

Existing Approvals

The source has been operating under the following approvals:

- (1) CP 163-3330-00007, issued on October 26, 1994.
- (2) 007-SPB-001, issued on July 7, 1995 by the Evansville EPA.

(3) 007-SPB-002, issued on July 7, 1995 by the Evansville EPA.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996. Additional information was received on January 26, 1998.

A notice of completeness letter was mailed to Hahn Equipment Company on January 13, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (two (2) pages).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)					
PM	less than 100					
PM-10	less than 100					
SO ₂	less than 100					
VOC	less than 100					
СО	less than 100					
NO_x	less than 100					

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)					
Xylene	greater than 10					
ethylene glycol	greater than 10					
toluene	less than 10					
ethylbenzene	less than 10					
methyl isobutyl ketone	less than 10					
TOTAL	greater than 25					

- (a) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 Throughput and Emission Statement Inventory Review of Hahn Equipment Company performed by the Evansville Environmental Protection Agency.

Pollutant	Actual Emissions (tons/year)
PM	0.03
PM-10	0.03
SO ₂	0.00
VOC	6.02
СО	0.05
HAP (specify)	2.80
NO _x	0.36

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status					
TSP	secondary nonattainment					
PM-10	unclassified					
SO ₂	attainment					
NO_2	attainment					
Ozone	marginal nonattainment					
СО	attainment					
Lead	attainment					

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as nonattainment for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this source is not considered a major source because it has potential emissions less than 250 tons per year of Carbon Monoxide (CO) Sulfur Dioxide (SO₂). Therefore 326 IAC 2-2 is not applicable.

326 IAC 2-3 (Emission Offsets)

This source is located in Vanderburgh County, which is designated as secondary nonattainment for PM-10 and marginal nonattainment for ozone. Pursuant to 326 IAC 2-3 (Emission Offsets), this source is not considered a major source because it has potential emissions less than 100 tons per year of VOC, NOx, and PM-10. Therefore, 326 IAC 2-3 is not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC in Vanderburgh County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The source shall comply with the fugitive dust limitations outlined in 326 IAC 6-4 (Fugitive Dust Emissions). No fugitive dust emissions shall be visible crossing the boundary or property line of the source.

State Rule Applicability - Individual Facilities

326 IAC 2-1-3.4 (New Source Toxics Control)

Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). The surface coating booths identified as SB-1, SB-2, and SB-3 were constructed before the rule applicability date of July 27, 1997. Therefore, these facilities are not subject to the requirements of 326 IAC 2-1-3.4.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) overspray from the surface coating booths (SB-1, SB-2, and SB-3) be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where $E =$ rate of emission in pounds per hour and $P =$ process weight rate in tons per hour

The spray booths are equipped with either dry filters or waterwash particulate capture systems each with a 95% collection efficiency to comply with 326 IAC 6-3-2 (Process Operations).

326 IAC 8-1-6 (General Reduction Requirements)

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements), facilities constructed after January 1, 1980 with potential VOC emissions equal to or greater than 25 tons per year, located anywhere in the state, which are not regulated by other provisions in 326 IAC Article 8, shall reduce VOC emissions using Best Available Control Technology (BACT).

- (a) The surface coating booth (SB-1) is not subject to this rule because it has potential VOC emissions less than 25 tons per year and was constructed prior to 1980:
- (b) The surface coating booth (SB-2) is not subject to this rule because it is regulated by 326 IAC 8-2-9 (Miscellaneous Metal Coatings); and
- (c) The surface coating booth (SB-3) is not subject to this rule because it was constructed prior to 1980.

Therefore, the regulations under 326 IAC 8-1-6 (General Reduction Requirements), are not applicable.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no facility engaged in the surface coating of miscellaneous metal parts may allow the discharge into the atmosphere of 3.5 pounds per gallon of coating less water delivered to the applicator in a coating application system that is air dried or forced warm air dried at temperatures up to 194 degrees Fahrenheit.

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator of SB-2 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) Solvent sprayed from application equipment in SB-2 during cleanup or color changes

shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and emissions calculations, the surface coating booth SB-2 is in compliance with this requirement.

(c) Pursuant to 326 IAC 8-2-1 (Surface Coating Emission Limitations: Applicability), the surface coating booths identified as SB-1 and SB-3 are not subject to 326 IAC 8-2-9 (Miscellaneous Metal Coatings) because they were constructed prior to 1980 in Vanderburgh County.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The surface coating booth SB-2 has applicable compliance monitoring conditions as specified below:

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator of SB-2 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) Solvent sprayed from application equipment in SB-2 during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

These monitoring conditions are necessary to comply with 326 IAC 8-2-9 (Miscellaneous Metal Coatings).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations. (Page 2 of 2)

Conclusion

The operation of this multi-purpose golf course grounds keeping equipment and consumer products assembly plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T163-7624-00007.

Indiana Department of Environmental Management Office of Air Management and the Evansville Environmental Protection Agency

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Hahn Equipment Company

Source Location: 1625 N. Garvin St, Evansville, IN 47711

County: Vanderburgh

SIC Code: 3523

Operation Permit No.: T163-7624-00007
Permit Reviewer: Jeremy Magliaro / EVP

On April 4, 1998, the Office of Air Management (OAM) had a notice published in the Evansville Courier, Evansville, Indiana, stating that Hahn Equipment Company had applied for a Part 70 Operating Permit for the operation of their surface coating, assembly, and shipment of multi-purpose golf course grounds-keeping equipment and consumer products source. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 13, 1998, and November 9, 1998, Hahn Equipment Company submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment #1

The equipment listed in Section A.2 of the proposed Part 70 Permit should be amended to reflect the correct information.

- (i) Under condition A.2(a), it should be indicated that "airless electrostatic application" is used rather than air atomization application.
- (ii) Under condition A.2(b), it should be indicated that "electrostatic with air assist application" is used rather than airless electrostatic application.
- (iii) Under condition A.2(c), it should be indicated that "electrostatic with air assist application" is used rather than airless atomization application.

Response #1

The equipment listing under permit condition A.2 as well as the equipment listing in Section D.1 has been revised as follows to incorporate the aforementioned comments:

(a) one (1) spray paint booth, identified as SB-1, equipped with an overhead conveyor and closing doors at both ends, with a maximum capacity of coating one (1) metal frame per hour, utilizing air atomization airless electrostatic application with dry filters for particulate control, and exhausted through one (1) stack (S/V ID P-01);

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one (1) spray paint booth, identified as SB-2, with a maximum capacity of applying 2.4 (b) gallons of paint per hour, utilizing airless electrostatic electrostatic with air assist application with dry filters for particulate control, and exhausted through one (1) stack (S/V ID P-02);

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(c) one (1) spray paint booth, identified as SB-3, with a maximum capacity of coating 10 feet per minute of products, utilizing air atomization electrostatic with air assist application with waterwash for particulate control, and exhausted through one (1) stack (S/V ID P-03);

Comment #2

We request the inclusion of an insignificant activity into our Title V Operating permit. The addition will be a heat-cleaning oven to be used for the removal of excess paint from paint hooks and some painted components. The oven fueled by natural gas has an input of 515,000 Btu per hour with no alternative source of fuel. A separate exhaust stack will be constructed specifically for this unit. The oven is equipped with an afterburner chamber and according to the manufacturer discharges to the atmosphere consists primarily of water vapor and carbon dioxide that is smokeless and odorless.

Response #2

This oven has been determined to qualify as an incinerator pursuant to 326 IAC 4-2 (Incinerators). Therefore, this heat cleaning oven is a specifically regulated insignificant activity. It will be added into Condition A.3 and a new Section D.2. as follows. Pursuant to 326 IAC 4-2-2 (Incinerators), the following operating requirement has been incorporated into Section D.2.

Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] A.3 [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

one (1) natural gas fired heat cleaning oven rated at 515,000 Btu per hour, (a) equipped with an afterburner and exhausted through one (1) stack.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - The following insignificant activities:

(a) one (1) natural gas fired heat cleaning oven rated at 515,000 Btu per hour, equipped with an afterburner and exhausted through one (1) stack.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 4-2]

Pursuant to 326 IAC 4-2-2 (Incinerators), this natural gas fired heat cleaning oven, rated at 515,000 Btu per hour shall:

- Consist of primary and secondary chambers or the equivalent. (a)
- Be equipped with a primary burner unless burning wood products. (b)

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(c) Comply with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2 (Permit Review Rules).

- (d) Be maintained properly as specified by the manufacturer and approved by IDEM.
- (e) Be operated according to the manufacturer's recommendation and only burn waste approved by the IDEM.
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.
- (g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented.
- (h) Not create a nuisance or a fire hazard.
- (i) Not emit particulate matter (PM) in excess of 0.5 pounds per 1000 pounds of dry exhaust gas corrected to 50% excess air.

The operation of this incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

Compliance Determination Requirement

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Comment #3

Regarding Condition B.14 (Permit Shield), inclusion of this provision is not supported by the federal Title V permitting regulations, is counter to the very purpose of the permit shield, and should be omitted from the permit. Review of 40 CFR 70 indicates that there is no requirement or basis for this provision. See (40 CFR 70.6(f) (establishing permit shield requirements). In addition, legislative and regulatory history are clear that one of the primary purposes of the permit shield is to afford a permittee protection from enforcement where, despite possible alternative interpretations of a regulation, a permittee complies in good faith with the provisions of its permit. The draft permit term at issue, however, impermissibly erodes such protection. For example, where a permittee has offered a reasonable interpretation as to how a regulation should be applied to its facility and this interpretation becomes part of the permit, under the proposed permit term, the state or a third party could now later assert that the permittee's interpretation is incorrect and, because the permittee's approach was included as part of the permit application, could contend that the permittee is not afforded permit shield protection.

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Similarly, this provision does not properly account for the evolving nature and improvements in air quality related science. For example, where a permittee has included an emission factor in its permit application for determining compliance, and that emission factor later becomes revised based on additional research and information, it is inappropriate to contend that the permit shield should not apply and that a permittee

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could be now considered to be out of compliance. inclusion of the draft permit term also is inappropriate when considering the delay between the time of permit application submittal and the time it takes for IDEM to finally act on and issue a facility a Title V permit. Relating permit shield protection, or inthis case nullification of such protection, back to submittal of the original application ignores that many changes to permit terms will occur through permit negotiation and possibly public, affected state, and EPA review and comment. thus, under the draft permit term, a third party or environmental agency could argue that even where the permit contains "accurate" information, where the originally submitted application contains information that is no longer deemed accurate or correct, the permittee is not entitled to permit shield protection. Clearly, a permittee should not be entitled to permit shield protection where the permittee intentionally or

knowingly submits incorrect information. Where a permittee submits information in good faith and certifies this information to be correct, however, and that information undergoes IDEM review, citizen review and comment, and EPA review, and becomes part of the Title V permit, the permittee should be entitled to protection that comliance with the terms of its permit is sufficient to demonstrate compliance with applicable requirements addressed in the permit for the limited term of its permit. If permitting information is later determined to be incorrect, the appropriate remedy is to eigher modify a permit provision during permit reissuance or to follow permit reopening procedures and revise the permit accordingly, not to strip a permittee of permit shield protection.

Recognizing that the provision at issue has unfortunately been included in the state's permitting rules, to the extent that it is included in any permit, it should, at a minimum, be modified to include the underlined statement as follows:

No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application where such information was known to the permittee to be erroneous at the time of submittal.

IDEM has determined that the current condition language does not reflect the true intent of the condition. Therefore, additional language will be added to subsection (d) in order to define the term "erroneous information".

Permit Shield [326 IAC 2-7-15] B.14

No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information refers to information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

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Comment #4

Regarding Condition B.28 (Credible Evidence), this provision is not required under applicable permitting rules, is counter to the policy of Title V, and should be omitted from the permit. Title V was intended by Congress to compile all existing applicable requirements in one document and clarify how the facility would demonstrate compliance with these applicable requirements. The proposed language impairs this goal. As noted by EPA in the preamble to the part 70 rules, "[t]he title V permit is intended to record in a single document the substantive requirements derived from elsewhere in the Act...Title V is primarily procedural, and is not generally intended to create any new substantive requirements." 57 Fed. Reg. 32284 (July 21, 1992). IDEM's proposed permit provision is not an "applicable requirement" under 40 CFR Part 70 or 326 IAC 2-7-1(6), is not required under applicable federal or state permitting rules, and should be omitted from the permit.

Contrary to the assertion in IDEM's Technical Support Document that EPA "would object to any permit that did not address the use of credible evidence,' Region V EPA has not objected to issuance of numerous Title V operating permits that do not include the proposed permit term regarding "credible evidence." In fact, Region V has not objected to Title V permits that do not include any discussion or permit term regarding use of so-called "credible evidence." Perhaps more importantly, EPA lacks authority under 40 CFR 70.8(c), which governs EPA objection to permits, to object to issuance of a permit based solely on its desire for "credible evidence" language because such language is not an "applicable requirement" and is not required under Part 70. Accordingly, this provision should be omitted from the permit.

Response #4

The IDEM now believes that this condition is not necessary and has remove it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of credible evidence and an explicit statement is not required in the permit.

B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Not withstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Section A (Source Summary) has been revised to clarify that the description of the source in conditions A.1 through A.3 is informational only and does not constitute separately enforceable conditions. The descriptive information in other permit conditions is enforceable.

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the Evansville Environmental Protection Agency, and presented in the permit application. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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2. Vanderburgh county has been redesignated from nonattainment to attainment (maintenance) for ozone. Therefore, Volatile Organic Compounds (VOC) and Oxides of Nitrogen (NOx) will be reviewed pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21, instead of 326 IAC 2-3 (Emission Offset). The county status designation of Condition A.1 has been changed as follows to indicate the redesignation as follows:

County Status: Nonattainment for ozone and particulate matter (TSP)

Attainment for all criteria pollutants;

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- 3. The OAM has determined that the following insignificant activities are specifically regulated because the have the potential to emit PM emissions into the atmosphere. Therefore, the following insignificant activities have been inserted into Condition A.3 of the proposed permit:
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) one (1) natural gas fired heat cleaning oven rated at 515,000 Btu per hour, equipped with an afterburner and exhausted through one (1) stack.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (d) The following other insignificant activities with PM emissions less than five (5) pounds per hour or twenty-five (25) pounds per day:
 - (1) hand-held grinding and machining operations; and
 - (2) one (1) centerless grinding machine.
- 4. Condition A.5 (Prior Permit Conditions Superceded) has been deleted. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions.
- A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

5. Condition B.1(b) (Permit No Defense) has been revised to reference the permit shield condition that is found later in Section B.

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(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

- 6. Condition B.8 (c) (Duty to Supplement Information) has been revised to clarify how the Permittee may assert a claim that records are confidential information:
 - (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall furnish such records to IDEM, OAM and Evansville Environmental Protection Agency along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.
- 7. Section B.11 (c) (Annual Compliance Certification) has been revised to match changes to the federal Part 70 rules. The language in (c)(3) has been revised since it appears to be a clarification rather than a change in the requirement. The language in (c)(5) has been added to clarify the treatment of insignificant activities. OAM is revising the nonrule policy document Air-007 NPD to provide more guidance regarding the annual compliance certification requirements for sources with Title V permits:
 - (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification:
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (5) (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, and Evansville Environmental Protection Agency may require to determine the compliance status of the source.

The notification which shall be submitted submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

8. Condition B.12 (a) (Preventive Maintenance Plan) has been revised to more closely match the language in 326 IAC 1-6-3. A provision allowing a one time extension of the time within which the Permittee must prepare and maintain the PMP has also been added to (a).

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Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- If required by specific condition(s) in Section D of this permit, the Permittee shall prepare (a) and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
 - A description of the items or conditions that will be inspected and the inspection (2) schedule for said items or conditions:
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Boulevard Evansville, Indiana 47708

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- PMP's shall be submitted to IDEM, OAM and Evansville Environmental Protection (c) Agency upon request and shall be subject to review and approval by IDEM, OAM and Evansville Environmental Protection Agency.
- 9. Condition B.14 (Permit Shield) condition has been revised to clarify how the permit shield affects applicable requirements from previous permits and how the permit shield affects determinations that a specific requirement is not applicable to the source.

Permit Shield [326 IAC 2-7-15] B.14

- This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (a) (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

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Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided **that** either of the following:

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- (1) The applicable requirements are included and specifically identified in this permit; **or**
- (2) IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof. The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (b) (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM and Evansville Environmental Protection Agency shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) (d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (d) (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

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(e) (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

- (f) (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, and Evansville Environmental Protection Agency has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and Evansville Environmental Protection Agency has issued the modification. [326 IAC 2-7-12(b)(8)]
- 10 Condition B.16 (Deviations from Permit Requirements and Conditions) has been revised to add the deviation terminology that had been contained in Section C, in the General Reporting Requirements condition:
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
 - (a) Deviations from any permit requirements (for emergencies see Section B Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(b) (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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(e) (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

- 11 Condition B.18 (a) (Permit Renewal) has been changed as follows to clarify the treatment of certain trivial activities :
 - (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).
- Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification), and B.21 (Significant Permit Modification) have all been combined into one condition numbered B.19 (Permit Amendment or Modification). Conditions B.20 and B.21 have been deleted. The new Condition B.19 (Permit Amendment or Modification) will read as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Boulevard Evansville, Indiana 47708

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- 13. Condition B.26 (now renumbered B.24) (Inspection and Entry) has been revised to remove the requirement for an IDEM identification card, which other agencies do not have.

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B.26 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of IDEM **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, Evansville Environmental Protection Agency, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, and Evansville Environmental Protection Agency, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, and Evansville Environmental Protection Agency, nor an authorized representative, may disclose the information unless and until IDEM, OAM, and Evansville Environmental Protection Agency, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, IDEM, OAM, and Evansville Environmental Protection Agency acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]
- 14. Condition B.27 (b)(now re-numbered B.25) (Transfer of Ownership or Operation) has been revised to clarify that this notification does not require a certification by a responsible official.
 - (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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15. Condition B.28 (now renumbered B.26) (Annual Fee Payment) has been revised to clarify the Permittee's responsibility for the timely payment of annual fees.

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. or in a time period consistent with the fee schedule established in 326 IAC 2-7-19. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.
- 16. Vanderburgh county has been redesignated from nonattainment to attainment (maintenance) for ozone. Therefore, Volatile Organic Compounds (VOC) and Oxides of Nitrogen (NOx) will be reviewed pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21, instead of 326 IAC 2-3 (Emission Offset).

On July 1, 1987, the U.S. EPA determined that the particulate pollutant of concern was smaller particles and replaced TSP with PM10. The consequence of this change is that U.S. EPA no longer designates areas as attainment or nonattainment for TSP. The TSP nonattainment designations can be eliminated, however the following rules apply: (a) TSP is no longer designated, those eight (8) counties previously nonattainment for TSP are not to be considered attainment or unclassifiable for TSP; (b) All opacity rules for the previously designated eight (8) nonattainment counties are still effective:

Vanderburgh county was previously listed as nonattainment for TSP and regulated under 326 IAC 2-3 (Emission Offsets). However, it will now be reviewed pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21. Condition C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21], has been changed to read as follows;

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential emissions of Carbon Monoxide (CO), and Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOC), Nitrous Oxides (NOx) and Particulate matter (PM-10) are less than 250 tons per 365 consecutive day period year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change potential emissions of CO, VOC, NOx, PM-10, and/or SO₂ to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

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17. Condition C.2: Emission Offset Minor Source Status, has been deleted from the permit because VOC, NOx, and TSP are no longer regulated under 326 IAC 2-3 (Emission Offsets). Preceding

C.2 Emission Offset Minor Source Status [326 IAC 2-3]

conditions have been renumbered due to this deletion.

- (a) The total source potential to emit Volatile Organic Compounds (VOC) Nitrous Oxides (NOx) and Particulate Matter (TSP) are less than 99 tons per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) will not apply.
- (b) Any change or modification which may increase potential emissions of VOC, NOx, or TSP to 100 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require an Emission Offset pursuant to 326 IAC 2-3, before such change may occur.
- 18. Condition C.2 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) is a new condition that reads as follows to address the PM emission limitation for facilities below 100 pounds per hour.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

19. The last sentence of Condition C.2 (renumbered C.3), has been deleted and the condition has been revised to reflect current rule language. The condition has been changed to:

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions **opacity** shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions Opacity shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings, any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Visible emissions Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings)—as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- 20. The Evansville city area has a local ordinance banning open burning. Therefore, the following additions were made to Condition C.4 Open Burning:

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable. However, the city of Evansville has a local ordinance (3.30.18.214) which prevents open burning.

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21. Condition C.7 (Operation of Equipment) has been revised to clarify the requirement.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission units vented to the control equipment are in operation. as described in Section D of this permit.

22. Condition C.8 (Stack Height) has been has been determined to not be applicable to this source, therefore, the condition has been removed.

C.8 Stack Height [326 IAC 1-7]

- (a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- (b) Any change in an applicable stack shall require prior approval from IDEM, OAM.
- 23. Conditions C.9 (Asbestos Abatement Projects-Accreditation) and C.12 (Asbestos Abatement Projects) have been combined into one new condition C.8(Asbestos Abatement Projects).

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present. The condition stating that all demolition projects require notification is not federally enforceable.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

> Indiana Department of Environmental Management Asbestos Section, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Boulevard Evansville, Indiana 47708

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
 The Permittee shall comply with the emission control procedures in 326 IAC 14-104 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are
 mandatory for any removal or disturbance of RACM greater than three (3) linear
 feet on pipes or three (3) square feet on any other facility components or a total of
 at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
 The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or
 operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos
 Inspector to thoroughly inspect the affected portion of the facility for the presence
 of asbestos. The requirement that the inspector be accredited is federally
 enforceable.
- 24. Condition C.10 (now C.9) (Performance Testing) is revised to correct a rule citation, add a notification requirement, and clarify that any submittal under this condition does not require a certification by a responsible official:
- C.9 Performance Testing [326 IAC 3-2.1] [326 IAC 3-6]
 - (a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Boulevard Evansville, Indiana 47708

no later than thirty-five (35) days before prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- 25. Condition C.11 (now C.10) (Compliance Schedule) has been revised to more closely match the rule language.
- C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and Will continue to comply with such requirements that become effective during the term of this permit; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit. Has certified that all facilities at this source are in compliance with all applicable requirements.
- 26. Condition C.12 (now C.11) (Compliance Monitoring) has been revised to allow a one time extension of the time to install and initiate any required monitoring.
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee shall notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

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in writing, prior to the end of the initial ninety (90) day compliance schedule no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date. and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

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The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34)

27. Condition C.13 (now C.12) (Monitoring Methods) is a new condition that has been added to the permit. This condition is mandatory for all Part 70 Operating Permits.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

- 28. Condition C.13 (Risk Management Plan) has been revised to more closely match the rule language of 40 CFR 68 and clarify that any submittal under this condition requires a certification by a responsible official.
- C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - A compliance schedule for meeting the requirements of 40 CFR 68 by the date (1) provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3)A verification to IDEM, OAM, and the Evansville Environmental Protection Agency, that a RMP or a revised plan was prepared and submitted as required by 40 CFR
- (b) Provide annual certification to IDEM, OAM, and the Evansville Environmental Protection Agency, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- 29. Condition C.14 (Compliance Monitoring Plan-Failure to Take Response Steps) the following rule cites were changed and added to the title, as follows:
- Compliance Monitoring Plan Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]
- 30. Condition C.15 is revised to add the following rule cites to the title, and clarify that any submittal under this condition does not require a certification by a responsible official.

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Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- When the results of a stack test performed in conformance with Section C Performance (a) Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- Condition C.16 (a) has been revised to clarify the certification requirement for the emission 31. statement.
- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6] [326 IAC 2-7-19 (e)]
 - The Permittee shall submit an certified, annual emission statement certified pursuant to (a) the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
- 32. Condition C.18 (General Record Keeping) is revised to add the following rule citation and to change the requirements for keeping records, making records available, and furnishing records, to more closely match the rule language as follows:
- General Record Keeping Requirements [326 IAC 2-7-5(3)(B)][326 IAC 2-7-6] C.18
 - (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request within one (1) hour upon verbal request of an IDEM, OAM, and the Evansville Environmental Protection Agency, representative, for a minimum of three (3) years. They The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request providing they are made available within thirty (30) days after written request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.

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33. Condition C.19 (General Reporting Requirements) is revised to clarify what is included in the compliance monitoring reports and clarify that any submittal under this condition does not require a certification by a responsible official. The deviation terminology was moved to a Section B condition titled Deviations from Permit Requirements and Conditions.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a Quality **Quarterly** Compliance **Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

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(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Boulevard Evansville, Indiana 47708

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the Evansville Environmental Protection Agency, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

34. Section D.1 (Facility Operating Conditions) the following rule cite has been added to the facility description box in all D sections and the following wording has been changed.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- 35. Condition D.1.4 (Testing Requirements) has been revised to clarify the condition.:
- D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

Testing of The Permittee is not required to test this facility is not specifically required by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit in D.1.1 or the PM limits in D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

- 36. Condition D.1.5 (Volatile Organic Compounds) has been revised to incorporate new rule cites.
- D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a)(7) 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

37. Complying with the requirements of 326 IAC 6-3-2 can be especially variable for paint booths. The actual substrate being painted and the solids content of the paint being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency, or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable. The OAM does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. The OAM believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance.

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The OAM has re-evaluated the other compliance monitoring provisions related to evidence of actual emissions from the paint booths and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly. Condition D.1.7, (Monitoring) and Condition D.1.8(b), (Record Keeping) have been revised to clarify the requirement.

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily weekly observations shall be made of the overspray from the surface coating booth stacks (P-01,P-02,P-03) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the month(s) of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.

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(b) To document compliance with Condition D.1.6 and D.1.7, the Permittee shall maintain a log of daily weekly overspray observations, daily and weekly monthly, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

FORMS:

- 1) On the Part 70 Operating Permit Certification Form, the checkbox and wording for "Emergency/Deviation Occurrence Reporting Form" has been deleted.
- 2) On the Emergency/Deviation Occurrence Reporting Form the wording "attach a signed certification to complete this report" on the bottom of the page has been deleted.
- 3) The Quarterly Compliance Report is now called the Quarterly Compliance Monitoring Report. The changes are shown on the next page.

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION and the EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY

PART 70 OPERATING PERMIT QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Source Address: Mailing Address: Part 70 Permit No.:	Hahn Equipment Compa 1625 North Garvin St., E 1625 North Garvin St., E T163-7624-00007	Evansville, Indiana		
Mo	nths: to	Yea	r:	
stated in this permit. monitoring requirements be attached if necess Occurrence Report.	mation that the source has This report shall be subments and the date(s) of eactary. This form can be supply the deviations occurred, ox marked "No deviation"	itted quarterly. An h deviation must b oplemented by atta please specify zer	y deviation from the come reported. Additional ching the Emergency on the column marker in th	compliance al pages may n/Deviation
9 NO DEVIATIONS	OCCURRED THIS REPO	RTING PERIOD		
	G DEVIATIONS OCCURR VITORING REQUIREMEN			EACH
	nitoring Requirement Condition D.1.3)	Number of Deviations	Date of each Deviations	
Form (

Attach a signed certification to complete this report.

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Vanderburgh county has been redesignated from nonattainment to attainment (maintenance) for ozone. Therefore, Volatile Organic Compounds (VOC) and Oxides of Nitrogen (NOx) will be reviewed pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21, instead of 326 IAC 2-3 (Emission Offset).

On July 1, 1987, the U.S. EPA determined that the particulate pollutant of concern was smaller particles and replaced TSP with PM10. The consequence of this change is that U.S. EPA no longer designates areas as attainment or nonattainment for TSP. The TSP nonattainment designations can be eliminated, however the following rules apply: (a) TSP is no longer designated, those eight (8) counties previously nonattainment for TSP are not to be considered attainment or unclassifiable for TSP; (b) All opacity rules for the previously designated eight (8) nonattainment counties are still effective;

Vanderburgh county was previously listed as nonattainment for TSP and regulated under 326 IAC 2-3 (Emission Offsets). However, they will now be reviewed pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21.

Pursuant to the above changes, the Technical Support Document should now read as follows:

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
TSP	secondary nonattainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	non attainment
СО	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as nonattainment maintenance for ozone.

State Rule Applicability

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this source is not considered a major source because it has potential emissions less than 250 tons per year of Carbon Monoxide (CO), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOC), Nitrous Oxides (NOx) and Particulate matter (PM-10). Therefore 326 IAC 2-2 is not applicable.

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Evansville, Indiana OP No. T163-7624-00007
Permit Reviewer: JM/EVP

326 IAC 2-3 (Emission Offsets)

This source is located in Vanderburgh County, which is designated as secondary nonattainment for PM-10 and marginal nonattainment for ozone. Pursuant to 326 IAC 2-3 (Emission Offsets), this source is not considered a major source because it has potential emissions less than 100 tons per year of VOC, NOx, and PM-10. Therefore, 326 IAC 2-3 is not applicable.

Vanderburgh county has been redesignated as maintenance for ozone. Therefore, VOC and NOx are no longer regulated under 326 IAC 2-3 (Emission Offsets). Pursuant to a revision in the State Implementation Plan (SIP) effective June 16, 1997, the U.S. EPA no longer designates areas as attainment or nonattainment for TSP. Therefore, the previously designated nonattainment status in Vanderburgh county is no longer applicable. Particulate matter is now designated using PM-10 emissions. Vanderburgh county is designated as attainment for PM-10, therefore 326 IAC 2-3 (Emission Offsets) is not applicable.

Appendix A: Emission Calculations VOC and Particulate From Surface Coating Operations

Company Name: Hahn Equipment Company

Address City IN Zip: 1625 N. Garvin Street, Evansville, IN 47711

Title V: T163-7624-00007
Reviewer: Jeremy Magliaro/EVP
Date: February 28, 1998

	Potential Emissions (uncontrolled):																
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour) (1)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Black Air Dty Enamel*	SB-1	8.81	58.65%	0.00%	58.65%	0.00%	28.00%	0.18750	1.00	5.2	5.17	0.97	23.25	4.24	1.65	41.01	0.45
Red Air Dry Enamel	SB-1	7.88	61.70%	0.00%	61.70%	0.00%	30.00%	0.18750	1.00	4.9	4.86	0.91	21.88	3.99	1.36	36.01	0.45
Grey Air Dry Primer*	SB-1	12.34	27.21%	0.00%	27.21%	0.00%	52.00%	0.06250	1.00	3.4	3.36	0.21	5.04	0.92	1.35	14.35	0.45
Red Bake High Solids	SB-2	8.98	35.50%	0.00%	35.50%	0.00%	56.80%	0.00400	600.00	3.2	3.19	7.65	183.62	33.51	18.27	8.02	0.7
Black Bake High Solids*	SB-2	8.90	37.70%	0.00%	37.70%	0.00%	54.30%	0.00400	600.00	3.4	3.36	8.05	193.27	35.27	17.49	8.83	0.7
Red Bake High Solids	SB-3	8.98	35.50%	0.00%	35.50%	0.00%	56.80%	0.00325	600.00	3.2	3.19	6.22	149.19	27.23	27.21	12.47	0.45
Black Bake High Solids*	SB-3	8.90	37.70%	0.00%	37.70%	0.00%	54.30%	0.00325	600.00	3.4	3.36	6.54	157.03	28.66	26.05	13.73	0.45
Tota Potential Emissions:												15.77	378.58	69.09	48.47		

Potential Emissions (controlled):

0.00%	95.00%	15.77	378.58	69.09	2.42
		per Hour	per Day	per Year	tons/yr
VOC	PM	VOC lbs	VOC lbs	VOC tons	PM
Control E	fficiency:	Controlled	Controlled	Controlled	Controlled

Total Potential Emissions:

- (1) The units for SB-1 and SB-3 are expressed here in linear feet per hour.
- (SB-1): The grey primer is applied first, then either the red or black enamel is applied. Potential VOC emissions from this booth are based primer and worst-case VOC usage in the Black Air Dry Enamel as applied with xylol thinner.
- (SB-2): Either the red or black bake high solids coating is applied at this booth station. Potential VOC emissions from this booth is based on worst-case VOC emissions from Black Bake H.S. enamel usage.
- (SB-3): Either the red or black bake high solids coating is applied at this booth station. Potential VOC emissions from this booth are based on worst-case VOC emissions from Black Bake H.S. enamel usage...
- * These coatings were used to calculate worst-case potential VOC emissions as indicated under total potential VOC emissions.

Potential PM emissions were based upon worst-case emissions from each booth. From SB-1: grey primer and black air dry, SB-2 and SB-3: Red Bake H.S.. The total PM emissions from these coatings is indicated under total Particulate potential emissions. Pursuant to 326 IAC 8-2-9 (Misc. Metal Coatings), the coatings delivered to the applicator of SB-2 shall not exceed 3.5 pounds VOC per gallon of coating less water.

Particulate matter emissions are controlled by dry filters or a waterwash, each with a 95% control efficiency.

Methodology

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency

Total = Worst Coating + Sum of all solvents used

Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

Appendix A: Emission Calculations Hazardous Air Pollutant (HAP) Emissions From Surface Coating Operations

Company Name: Hahn Equipment Company

Address City IN Zip: 1625 N. Garvin Street, Evansville, IN 47711

11.15

0.00

0.56

22.24

Title V: T163-7624-00007

Reviewer: Jeremy Magliaro/EVP

Date: February 28, 1998

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour) (4)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % Ethylen Glycol	Weight % MIBK	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene (ton/yr)	Ethylene Glycol (ton/yr)	MIBK Emissions (ton/yr)
Black Air Dty Enamel (1)	8.81	0.18750	1.00	36.57%	0.03%	7.80%	0.00%	0.00%	2.65	0.00	0.56	0.00	0.00
Red Air Dry Enamel (1)	7.88	0.18750		39.00%	0.00%	6.90%	0.00%	0.00%	2.52	0.00	0.45	0.00	0.00
Grey Air Dry Primer (1)	12.34	0.06250	1.00	0.90%	0.00%	0.00%	0.00%	16.00%	0.03	0.00	0.00	0.00	0.54
Red Bake High Solids (2)	8.98	0.004	600.00	3.00%	0.00%	0.00%	13.00%	0.00%	2.83	0.00	0.00	12.27	0.00
Black Bake High Solids (2)	8.90	0.004	600.00	5.00%	0.00%	0.00%	11.00%	0.00%	4.68	0.00	0.00	10.29	0.00
Red Bake High Solids (3)	8.98	0.003	600.00	3.00%	0.00%	0.00%	13.00%	0.00%	2.30	0.00	0.00	9.97	0.00
Black Bake High Solids (3)	8.90	0.003	600.00	5.00%	0.00%	0.00%	11.00%	0.00%	3.80	0.00	0.00	8.36	0.00

(1) Indicates operations at Booth #1 (SB-1). The grey primer is applied first, then either the red or black enamel is applied. Potential emissions from this booth are from primer and worst-case enamel usage as applied with xylol thinner.

- (2) Indicates operations at Booth #2 (SB-2). Either the red or black bake high solids coating is applied at this booth station. Potential emissions of each HAP are based on worst-case emissions.
- (3) Indicates operations at Booth #3 (SB-3). Either the red or black bake high solids coating is applied at this booth station. Potential emissions of each HAP are based on worst-case emissions.

Potential emissions of each HAP listed above are based on worst-case HAP emissions from each booth. For example, worst-case Xylene emissions are equal to: 2.65+0.03(primer)+4.68+3.80 = 11.15 tons Xylene/yr.

Worst case Total HAP emissions are from the usage of the Black Air Dry enamel and grey primer from SB-1, and the usage of Red Bake H.S. at SB-2 and SB-3.

Total potential HAP emissions are: (Booth 1) 2.65+0.56+0.03+0.54 + (Booth 2) 2.83+12.27 + (Booth 3) 2.30+9.97 = 31.12 tons Total HAP/year.

The worst-case single HAP is ethylene glycol with emissions of 22.24 tons/year.

(4) The units for SB-2 and SB-3 are expressed here in linear feet per hour.

METHODOLOGY

Total Potential Emissions

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs